

## REMARKS

The Examiner has rejected Claims 1, 6-11, 16-23, 29 and 30 under 35 U.S.C.102(e) as being anticipated by Devine et al. (U.S. Patent No.6,631,402). Applicant respectfully disagrees with such rejection.

With respect to independent Claims 1, 11 and 21, the Examiner has relied on Col. 7, lines 26-47; Col. 11, lines 60-67; Col. 8, lines 1-25; Col. 16, lines 21-34; and Col. 20, lines 52-67 in Devine to make a prior art showing of applicant's claimed "identifying a plurality of templates provided based on user input." Specifically, the Examiner has argued that such excerpts teach that a "user has access to various templates including Traffic information templates."

Applicant respectfully disagrees. Such excerpts merely disclose "a variety of application specific proxies...including... a Report Manager Proxy...for generating, managing and receiving notification of customized reports including, for example...network traffic analysis/monitor information provided from the Traffic view server 34" (Col. 7, lines 26-47), "user report customization options" (Col. 11, lines 60-67), "data transport mechanisms" (Col. 8, lines 1-25), and "selection and presentation of the Report Requestor display which presents the reporting options to a user" (Col. 16, lines 21-34). Clearly, such teachings do not even suggest "identifying a plurality of templates provided based on user input" (emphasis added), as claimed.

In addition, applicant notes that Col. 20, lines 52-67 from Devine, as relied on by the Examiner, disclose "types of requests that may be initiated by the Report Requestor...[including] 1) Get/Send report template list (GRTL/SRTL)--which request retrieves the list of all standard report templates for all products and is used only to obtain general report information, e.g., report title, description, etc.; 2) Get/Send report template detail (GRTD/SRTD)--which request retrieves the details of a specific standard report template." Applicant respectfully asserts that merely disclosing a get/send report template list request that retrieves standard report templates and is used to obtain general

report information, in addition to a get/send report template detail request which retrieves details of a specific standard report template, as in Devine, fails to specifically teach “identifying a plurality of templates provided based on user input” (emphasis added), as claimed.

Also with respect to independent Claims 1, 11 and 21, the Examiner has relied on Col. 12, lines 46-67; Col. 16, lines 41-67; Col. 17, lines 34-67; and Col. 18, lines 1-17 in Devine to make a prior art showing of applicant’s claimed “querying a database for network traffic information based on the identified templates” (see this or similar, but not necessarily identical language in the foregoing independent claims). Specifically, the Examiner has argued that such excerpts teach that a “report manager utilizes a database.”

Applicant respectfully disagrees and asserts that the excerpts relied on by the Examiner merely disclose that a “report manager server additionally utilizes a database 258, such as provided by Informix, to provide accounting of metadata and user report inventory” (Col. 12, lines 46-67), that a “user is enabled to edit an existing report maintained in the report manager inventory” (Col. 16, lines 41-67) and that “[w]hether creating a new report or editing an existing report, the user is enabled to select customization options” (Col. 17, line 34-Col. 8, line 17).

However, simply disclosing that a report manager server uses a database to provide accounting of metadata and user report inventory, and that a user is enabled to edit an existing report by selecting customization options, as in Devine, does not meet applicant’s claimed “querying a database for network traffic information based on the identified templates” (emphasis added), as specifically claimed.

Further, with respect to the independent claims, the Examiner has relied on Col. 14, lines 26-43 in Devine to make a prior art showing of applicant’s claimed “populating the templates with the network traffic information” (see this or similar, but not necessarily identical language in each of the independent claims). Specifically, the Examiner has noted that Devine teaches “information used to fill reports.”

Applicant respectfully disagrees and asserts that the excerpt from Devine relied on by the Examiner merely discloses a “GUI Applet enabling user interaction for managing reports” (Col. 14, lines 26-27). Clearly, simply allowing a user to manage reports via a GUI applet, as in Devine, fails to even suggest any sort of “information used to fill reports,” as noted by the Examiner, and especially does not teach “populating the templates with the network traffic information,” as claimed.

Still with respect to the independent claims, the Examiner has relied on Col. 13, lines 26-41; Col. 18, lines 46-67; and Col. 20, lines 42-50 in Devine to make a prior art showing of applicant’s claimed technique “wherein the templates are generated based on a plurality of user-configured parameters including network portions to be reported, a format of the reporting, a time or period, where the network traffic information comes from, what type of network traffic information is used, and to what location the network traffic information is written.” In particular, the Examiner has noted that Devine teaches “format types.”

Applicant respectfully disagrees and asserts that the excerpts from Devine relied on by the Examiner merely disclose an “Inbox Server component 270 [that] serves as the repository where the completed user report data is stored, maintained, and eventually deleted and is the source of data that is uploaded to the client” (Col. 13, lines 26-41). In addition, the excerpts disclose a “sorts tab [that] enables the user to specify columns to be sorted in an available sorts selection field 391, whether totals are to be made, whether the column data to be provided is in ascending or descending order” (Col. 18, lines 46-67), and further teach that “selection of available standard template reports is based on the user’s entitlements” (Col. 20, lines 42-50).

Clearly, simply disclosing a repository where completed user report data is stored, maintained, and eventually deleted and which is the source of data that is uploaded to the client, in addition to allowing a user to specify columns to be sorted, and teaching that a selection of available standard template reports is based on a user’s entitlements, as in

Devine, fails to even relate to a technique “wherein the templates are generated,” let alone specifically teach a technique “wherein the templates are generated based on a plurality of user-configured parameters including network portions to be reported, a format of the reporting, a time or period, where the network traffic information comes from, what type of network traffic information is used, and to what location the network traffic information is written” (emphasis added), as claimed.

With respect to independent Claim 22, the Examiner has relied on Col. 7, lines 26-47; Col. 11, lines 60-67; Col. 8, lines 1-25; Col. 16, lines 21-34; and Col. 20, lines 52-67 in Devine to make a prior art showing of applicant’s claimed “determining whether a network analysis reporting system is operating in a report mode or edit mode.” The Examiner has particularly argued that Devine teaches that a “user has access to various templates including Traffic information templates.”

Applicant respectfully disagrees. Such excerpts merely disclose “a variety of application specific proxies...including... a Report Manager Proxy...for generating, managing and receiving notification of customized reports including, for example...network traffic analysis/monitor information provided from the Traffic view server 34” (Col. 7, lines 26-47), “user report customization options” (Col. 11, lines 60-67), “data transport mechanisms” (Col. 8, lines 1-25), and “selection and presentation of the Report Requestor display which presents the reporting options to a user” (Col. 16, lines 21-34). Clearly, such teachings do not even suggest “determining whether a network analysis reporting system is operating in a report mode or edit mode” (emphasis added), as claimed.

In addition, applicant notes that Col. 20, lines 52-67 from Devine, as relied on by the Examiner, disclose “types of requests that may be initiated by the Report Requestor...[including] 1) Get/Send report template list (GRTL/SRTL)--which request retrieves the list of all standard report templates for all products and is used only to obtain general report information, e.g., report title, description, etc.; 2) Get/Send report template detail (GRTD/SRTD)--which request retrieves the details of a specific standard report

template.” Applicant respectfully asserts that merely disclosing a get/send report template list request that retrieves standard report templates and is used to obtain general report information, in addition to a get/send report template detail request which retrieves details of a specific standard report template, as in Devine, fails to specifically teach “determining whether a network analysis reporting system is operating in a report mode or edit mode” (emphasis added), as claimed.

Also with respect to independent Claim 22, the Examiner has relied on Figure 2, user input, paragraph [0121], paragraph [0079], paragraph [0081], paragraph [0115], paragraph [0126]; and Claim 29 in Devine to make a prior art showing of applicant’s claimed “if the network analysis reporting system is operating in the report mode, identifying a plurality of existing templates; [and]...if the network analysis reporting system is operating in the edit mode, creating a plurality of templates based on user input.”

Applicant respectfully asserts that it seems the Examiner has pointed to excerpts other than those disclosed in the Devine reference. For example, the Devine reference is not noted by paragraphs, but instead is noted by column and line number. In addition, Figure 2 of Devine does not show any sort of “user input,” as suggested by the Examiner, and the Devine reference does not include a Claim 29. Thus, applicant respectfully requests a notice of allowance or a proper prior art showing of such subject matter, in the context of the remaining elements.

With respect to independent Claim 23, the Examiner has relied on Col. 14, lines 26-40 in Devine to make a prior art showing of applicant’s claimed “determining whether the interface is operating in a report mode or edit mode.”

Applicant respectfully asserts that such excerpt from Devine merely discloses a “GUI Applet enabling user interaction for managing reports and particularly includes processes supporting: the creation, deletion, and editing of the user’s reports; the retrieval and display of reports based on selected criteria; the display of selected option data; and

the determination of entitlements which is the logical process defining what functionality a user can perform on StarWRS.” However, only disclosing a GUI applet allowing user interaction for managing reports, as in Devine, fails to specifically disclose “determining whether the interface is operating in a report mode or edit mode” (emphasis added), as claimed.

In addition, with respect to independent Claim 23, the Examiner has relied on Col. 14, lines 45-50 in Devine to make a prior art showing of applicant’s claimed “validating the parameter file.”

Applicant respectfully asserts that such excerpt from Devine merely discloses that “[t]o communicate with the StarOE for user security, hierarchy, paging and e-mail, etc. the Report Requestor uses StarOE client Java code,” and that “Report Requestor JAVA applets implementing the above-described report requestor functionality, are downloaded to the...customer’s workstation in the form of a cab file after initial login.” However, simply disclosing using Java code to communicate and downloading to a customer’s workstation Report Requestor JAVA applets implementing report requestor functionality, as in Devine, fails to even suggest any sort of validating, let alone “validating the parameter file,” as claimed.

Moreover, with respect to independent Claim 23, the Examiner has relied on Col. 14, lines 50-55 in Devine to make a prior art showing of applicant’s claimed “identifying templates in the parameter file, [and]...retrieving templates of a first type from a first module.”

Applicant respectfully asserts that such excerpt from Devine only discloses a “Report Viewer application 215 [that] is a GUI Applet enabling a user to analyze and display the data and reports supplied from the fulfilling servers.” Clearly, only disclosing a GUI applet that allows a user to analyze and display data and reports, as in Devine, fails to specifically teach “identifying templates in the parameter file, [and]...retrieving templates of a first type from a first module” (emphasis added), as claimed.

Still yet, with respect to independent Claim 23, the Examiner has relied on Col. 15, lines 15-65 from Devine to make a prior art showing of applicant's claimed "retrieving templates of a second type from a second module."

Applicant respectfully asserts that such excerpt simply teaches "associating each set of report data which is downloaded via the Inbox server 270 with a 'metadata' report description object, [such that] reports can be presented without report-specific presentation code" (Col. 15, lines 23-26). However, merely disclosing associating report data with a metadata report description object, as in Devine, does not meet applicant's claimed "retrieving templates of a second type from a second module" (emphasis added), as claimed.

The Examiner is reminded that a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described in a single prior art reference. *Verdegaal Bros. v. Union Oil Co. Of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Moreover, the identical invention must be shown in as complete detail as contained in the claim. *Richardson v. Suzuki Motor Co.* 868 F.2d 1226, 1236, 9USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim.

This criterion has simply not been met by the Devine reference, as noted above. Thus, a notice of allowance or a proper prior art showing of each of the foregoing claimed features, in combination with the remaining claimed features, is respectfully requested.

Applicant further notes that the prior art is also deficient with respect to the dependent claims. For example, with respect to dependent Claim 6 et al., the Examiner has relied on Col. 7, lines 26-47; Col. 11, lines 60-67; Col. 8, lines 1-25; Col. 16, lines 21-34; and Col. 20, lines 52-67 in Devine to make a prior art showing of applicant's

claimed technique “wherein the templates include templates of a first type and templates of a second type.”

Applicant respectfully asserts that such excerpts merely disclose “a variety of application specific proxies...including... a Report Manager Proxy...for generating, managing and receiving notification of customized reports including, for example...network traffic analysis/monitor information provided from the Traffic view server 34” (Col. 7, lines 26-47), “user report customization options” (Col. 11, lines 60-67), “data transport mechanisms” (Col. 8, lines 1-25), and “selection and presentation of the Report Requestor display which presents the reporting options to a user” (Col. 16, lines 21-34). Clearly, such teachings do not even suggest a technique “wherein the templates include templates of a first type and templates of a second type (emphasis added), as claimed.

In addition, applicant notes that Col. 20, lines 52-67 from Devine, as relied on by the Examiner, disclose “types of requests that may be initiated by the Report Requestor...[including] 1) Get/Send report template list (GRTL/SRTL)--which request retrieves the list of all standard report templates for all products and is used only to obtain general report information, e.g., report title, description, etc.; 2) Get/Send report template detail (GRTD/SRTD)--which request retrieves the details of a specific standard report template.” Applicant respectfully asserts that merely disclosing a get/send report template list request that retrieves standard report templates and is used to obtain general report information, in addition to a get/send report template detail request which retrieves details of a specific standard report template, as in Devine, fails to specifically teach a technique “wherein the templates include templates of a first type and templates of a second type (emphasis added), as claimed.

With respect to dependent Claim 8 et al., the Examiner has relied on Col. 13, lines 26-41; Col. 18, lines 46-67; and Col. 20, lines 42-50 in Devine to make a prior art showing of applicant’s claimed technique “wherein the templates of the first type and the templates of the second type differ with respect to a format thereof.”



Applicant respectfully asserts that such excerpts merely disclose that an “Inbox Server component 270 serves as the repository where the completed user report data is stored, maintained, and eventually deleted and is the source of data that is uploaded to the client user” (Col. 13, lines 26-41) in addition to teaching a “sorts tab [that] enables the user to specify columns to be sorted” (Col. 18, lines 46-67), and the “us[e of] the metadata to determine what a standard report should look like, the customization options the user has, and the types of screens that should be used for the various options,” where “the selection of available standard template reports is based on the user’s entitlements” (Col. 20, lines 42-50).

However, simply disclosing a repository for completed user report data and as a source of data that is uploaded to the client user, a sorts tab for allowing a user to specify columns to be sorted, using metadata to determine what a standard report should look like, and that a selection of available standard template reports is based on the user’s entitlements, as in Devine, fails to specifically teach a technique “wherein the templates of the first type and the templates of the second type differ with respect to a format thereof” (emphasis added), as claimed.

Again, since the above anticipation criterion has simply not been met by the Devine reference, a notice of allowance or a proper prior art showing of each of the foregoing claimed features, in combination with the remaining claimed features, is respectfully requested.

Still yet, applicant brings to the Examiner’s attention the subject matter of new Claims 31-32 below, which are added for full consideration:

“wherein the user-configured parameters are validated” (see Claim 31); and

“wherein the parameters are used for looping” (see Claim 32).

Again, a notice of allowance or a proper prior art showing of each of the foregoing claimed features, in combination with the remaining claimed features, is respectfully requested.

To this end, all of the independent claims are deemed allowable. Moreover, the remaining dependent claims are further deemed allowable, in view of their dependence on such independent claims.

In the event a telephone conversation would expedite the prosecution of this application, the Examiner may reach the undersigned at (408) 505-5100. The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 50-1351 (Order No. NAI1P067).

Respectfully submitted,  
Zilka-Kotab, PC

/KEVINZILKA/

Kevin J. Zilka  
Registration No. 41,429

P.O. Box 721120  
San Jose, CA 95172-1120  
408-505-5100